

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

JOHN RUSSO, as Personal Representative of  
the Estate of ANTHONY J. RUSSO,

Plaintiff,

v.

Civil Action No.: 2:23-cv-00611-EWH-DEM

MODEL TRANSPORT, LLC,

BSL LOGISTICS, LLC,

and

ANGESOM GHEBRENDRIAS,

Defendants.

**AMENDED JOINT PETITION FOR APPROVAL OF WRONGFUL DEATH  
SETTLEMENT**

COME NOW the Defendants, Model Transport, LLC, BSL Logistics, LLC, and Angesom Ghebrendrias, by counsel; and the Plaintiff, John Russo, as Personal Representative of the Estate of Anthony J. Russo, pursuant to Section 8.01-55 of the Code of Virginia, 1950, as amended, and respectfully represent to the Court as follows:

1. That on or about February 1, 2023, Anthony J. Russo and Angesom Ghebrendrias were involved in an auto accident.
2. That on or about February 5, 2023, Anthony J. Russo died, allegedly as a result of the auto accident.
3. That Model Transport, LLC, and Angesom Ghebrendrias had bodily injury liability coverage through Texas Insurance Company in the amount of \$1,000,000.00, this being their sole applicable insurance coverage for the accident.

4. That BSL Logistics, LLC, had bodily insurance liability coverage through Indemnity Insurance Company of North America.

5. That John Russo, as Personal Representative of the Estate of Anthony J. Russo, by counsel, made a wrongful death claim against Model Transport, LLC, BSL Logistics, LLC, and Angesom Ghebrendrias. Model Transport, LLC, BSL Logistics, LLC, and Angesom Ghebrendrias, by counsel, make no representations or admissions with regard to responsibility or fault of the accident or the cause of Anthony J. Russo's death.

6. That Texas Insurance Company, Model Transport, LLC, and Angesom Ghebrendrias, by counsel, have nevertheless offered a compromise in the amount of ONE MILLION DOLLARS AND ZERO CENTS (\$1,000,000.00), inclusive of all costs and attorney's fees. Model Transport, LLC certifies that this amount represents all insurance coverage available to Model Transport, LLC, and Angesom Ghebrendrias.

7. That Indemnity Insurance Company of North America and BSL Logistics, LLC, have nevertheless offered ONE HUNDRED THOUSAND DOLLARS AND ZERO CENTS (\$100,000.00), inclusive of all costs and attorney's fees.

8. That in consideration of the promise to make the payment set forth, Model Transport, LLC, BSL Logistics, LLC, Angesom Ghebrendrias, Texas Insurance Company, and Indemnity Insurance Company of North America will seek the complete release and discharge of Model Transport, LLC, BSL Logistics, LLC, Angesom Ghebrendrias, Texas Insurance Company, and Indemnity Insurance Company of North America, their administrators, assignees, officers, directors, stockholders, agents, employees, servants, parent corporations, subsidiaries, related or affiliated corporations and insurers, from any and all past, present or future claims, demands, obligations, actions, causes of action, rights, damages, medical bills, costs, losses,

expenses and compensation of any nature whatsoever, based on any theory of recovery and whether for compensatory, punitive or other damages, which John Russo, as Personal Representative of the Estate of Anthony J. Russo, Deceased, by counsel, and others now claim or which may hereafter accrue or otherwise be acquired on account of the injuries and damages allegedly sustained by Anthony J. Russo, Deceased, in the February 1, 2023, accident.

9. That John Russo is the sole statutory beneficiary of Anthony J. Russo, Deceased.

10. That, all medical bills, related expenses and liens incurred on behalf of the Estate of Anthony J. Russo, Deceased, related to the February 1, 2023, accident have been paid or will be paid in accordance with the Order Approving Settlement.

11. That the parties believe the settlement to be fair and reasonable and further ask this Court to approve the same.

12. That the funds be distributed as follows:

a.	Brain Injury Law Center	\$ 239,836.82*
b.	The Truck Accident Law Firm	\$ 233,436.61*
d.	John Russo	\$ 602,308.21
e.	Hampton Roads Radiology	\$ 212.00
f.	Medical Center Radiologist, Inc.	\$ 872.00
g.	Sentara Virginia Beach General Hospital	\$ 855.00
h.	Sentara Norfolk General Hospital	\$ 90.00
i.	Carelon Recovery Services	\$ 22,389.36
	<b>Total</b>	<b>\$ 1,100,000.00</b>

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\* An itemization of the costs for Plaintiff's counsel is attached hereto as Exhibit A.

### PLAINTIFF'S BRIEF EXPLANATION OF FEES AND EXPENSES

The tragic and untimely death of Mr. Anthony Russo unfolded on February 1, 2023, when Defendant Ghebrendrias ran a red light and struck Mr. Russo as he was leaving a doctor's appointment in Norfolk, Virginia. He was transported to the Emergency Department of Sentara Norfolk General where he underwent a multitude of tests, including a negative head MRI. He was subsequently released.

His son, John Russo, flew in from Florida to help care for him at his home in Virginia Beach. Over the next twenty-four hours, Anthony Russo declined to the point that his son called 911. Anthony was transported to the hospital where doctors observed him for several hours but did no further imaging. Hours later, Anthony Russo's health deteriorated. An emergency MRI found a brain bleed (subdural hematoma). He was pronounced deceased later that day, on February 5, 2023.

John Russo hired counsel on February 10, 2023, seeking answers to how the accident happened and the cause of his father's death. Plaintiff's counsel immediately notified Model Transport of its representation and requested an inspection of the tractor trailer. It took several weeks to identify the whereabouts of the tractor trailer, which was later located in Dallas, Texas. Plaintiff's counsel hired an expert from Virginia to fly to Dallas to inspect the tractor trailer and to gather evidence, which took place on March 17, 2023.

During this same period of time, Plaintiff's counsel hired an emergency room doctor to review the medical records to determine the cause of death. This expert related Russo's death from the subdural hematoma to the impact of the tractor trailer on February 1, 2023.

After significant investigation into the tractor trailer driver, and Model Transport, and BSL Logistics, LLC, Plaintiff's counsel sought the assistance of The Truck Accident Law Firm,

whose attorneys specialize in trucking cases. This was in an effort to assist counsel in finding additional insurance coverage and to help uncover additional parties to the transportation cycle. Joe Camerlengo is a board-certified expert in trucking cases. His firm helped draft a complaint, which was filed on November 30, 2023, which included BSL Logistics, LLC, since counsel found that it was involved in the transportation cycle of the goods being delivered by Defendant Ghebrendrias. His firm also took the lead with depositions of the parties and corporate representatives, seeking information related to BSL's involvement. Their expertise in this area of commercial trucking was instrumental in understanding the full relationships of all the parties, and unearthing additional potential parties, including TQL, Inc., who brokered the load in this matter. Joe Camerlengo's Affidavit and Biography supporting the fees and costs are attached as Exhibits B and C.

Counsel spent the better part of the next eighteen months, as this Court is well aware, taking depositions and exchanging written discovery and documents on the issue of BSL's involvement other than leasing the tractor to Ghebrendrias. Model and BSL produced a multitude of documents. Yet, roadblocks to information were numerous, including multiple witnesses who did not speak English, requiring a translator for the Tigre language, which is not a readily available language found in most translating services and which caused several continuances of these depositions.

Additionally, during this time, Plaintiff's counsel spent hundreds of hours investigating the traffic incident, including attempting to gather information from the Norfolk Police Department, requesting its full investigative file (which was never received). Ghebrendrias was also indicted by the Norfolk Commonwealth's Attorney for involuntary manslaughter as a result of this incident, adding additional difficulties in Plaintiff's attempts to depose him regarding his

relationship with Model, BSL, and others involved in the transportation cycle. His criminal case is still pending and is set for a hearing on April 2, 2025.

The majority of Plaintiff's expenses involved two categories: 1) depositions and translation services of multiple witnesses who all spoke a rather unusual language and 2) the investigation of the tractor trailer in Dallas by an expert in the field and investigating those involved in the transportation cycle who may have provided coverage for the accident. Those cases expenses are detailed in Exhibit A. Both firms advanced all costs of the litigation.

This is a brief recitation of counsel's efforts for the past two years seeking information and answers for John Russo and his family. Should this Court need further details of counsel's time and expenses, counsel respectfully request that full briefing be ordered.

WHEREFORE, Plaintiff, John Russo, as Personal Representative of the Estate of Anthony J. Russo, Deceased, and Model Transport, LLC, BSL Logistics, LLC, and Angsom Ghebrendrias, by counsel, request that this Court permit the filing of this Petition, convene the necessary parties, approve the compromise described herein, and enter an Order approving payment as outlined herein.

Respectfully submitted,

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David B. Holt (VSB No. 65564)  
*Co-Counsel for Plaintiff John Russo*  
THE BRAIN INJURY LAW CENTER  
27 W. Queen's Way, Suite 300  
Hampton, Virginia 23669  
Telephone: (757) 244-7000  
Facsimile: (757) 244-7046  
*dholt@smithlawcenter.com*

Stephen M. Smith (VSB No. 14362)  
David B. Holt (VSB No. 65564)  
C. Stewart Gill, Jr. (VSB No. 42789)  
*Co-Counsel for Plaintiff John Russo*  
THE BRAIN INJURY LAW CENTER  
27 W. Queen's Way, Suite 300  
Hampton, Virginia 23669  
Telephone: (757) 244-7000  
Facsimile: (757) 244-7046  
Email: *ssmith@braininjurylawcenter.com*  
Email: *dholt@smithlawcenter.com*  
Email: *sgill@smithlawcenter.com*

Joseph V. Camerlengo, B.C.S.  
(FL Bar No. 008192) – *Admitted Pro Hac Vice*  
Jessica L. Lanifero  
(FL Bar No. 021062) – *Admitted Pro Hac Vice*  
1200 Riverplace Blvd, Suite 902  
Jacksonville, Florida 32207  
Telephone: (904) 306-9220  
Facsimile: (904) 306-9221  
Email: *jvc@truckcrashlaw.com*  
Email: *jll@truckcrashlaw.com*  
Email: *team@truckcrashlaw.com*

### **CERTIFICATE OF SERVICE**

I certify that on March 7, 2025, I caused the foregoing document to be served by email upon the following counsel of record for the Defendants in this matter using the Court's ECF system, which caused the document to be so served:

James R. Jebo, Esq.  
Harman, Claytor, Corrigan & Wellman  
P.O. Box 70280  
Richmond, Virginia 23255  
804-747-5200 - Phone  
804-747-6085 - Fax  
*jjebo@hccw.com*  
Counsel for BSL Logistics, LLC

J. Matthew Haynes, Jr., Esq.  
McCandlish Holton, PC  
P.O. Box 796  
Richmond, VA 23218-0796  
804-775-3100 - Phone  
804-775-7209 - Fax  
*MHaynes@lawmh.com*  
Counsel for Model Transport, LLC and  
AngeSom Ghebrendrias

/s/

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David B. Holt